

SERFF Tracking Number: AGNN-126999868 State: Arkansas  
Filing Company: The Variable Annuity Life Insurance Company State Tracking Number: 47822  
Company Tracking Number: EDSAC-111  
TOI: A02.11 Individual Annuities- Deferred Non- Sub-TOI: A02.11.002 Flexible Premium  
Variable and Variable  
Product Name: EDSAC-111  
Project Name/Number: /

## Filing at a Glance

Company: The Variable Annuity Life Insurance Company

Product Name: EDSAC-111

SERFF Tr Num: AGNN-126999868 State: Arkansas

TOI: A02.11 Individual Annuities- Deferred Non- SERFF Status: Closed-Approved- State Tr Num: 47822

Variable and Variable

Closed

Sub-TOI: A02.11.002 Flexible Premium

Co Tr Num: EDSAC-111

State Status: Approved-Closed

Filing Type: Form

Reviewer(s): Linda Bird

Author: Angie Fox

Disposition Date: 02/01/2011

Date Submitted: 01/27/2011

Disposition Status: Approved-Closed

Implementation Date Requested: On Approval

Implementation Date:

State Filing Description:

## General Information

Project Name:

Status of Filing in Domicile: Pending

Project Number:

Date Approved in Domicile:

Requested Filing Mode:

Domicile Status Comments:

Explanation for Combination/Other:

Market Type: Individual

Submission Type: New Submission

Individual Market Type:

Overall Rate Impact:

Filing Status Changed: 02/01/2011

State Status Changed: 02/01/2011

Deemer Date:

Created By: Angie Fox

Submitted By: Angie Fox

Corresponding Filing Tracking Number:

Filing Description:

The above referenced form is submitted for review and approval. The endorsement is in final form and does not replace any form previously approved by your Department.

We certify that we are in compliance with Regulations 19 and 49 as well as AR. Code Ann. 23-79-138. Additionally, we certify we are in compliance with Regulation 6, Articles 6, 7, 9, and 10.

The Variable Annuity Life Insurance Company was approved to issue variable contracts in Arkansas on 05/01/69.

This endorsement will be used with individual fixed and variable annuity contract forms UIT-194, UIT-IRA-194, and

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UITN-194 approved by your department on 04/28/94, 12/21/94, and 04/28/94, respectively.

Endorsement EDSAC-111 increases the Separate Account fee up to a maximum of 2.10%. The increased fee is due to an increase in expenses related to offering the Contract in a new distribution channel comprised mainly of Independent agents.

Replacement pages were recently filed and approved in your state to change the fee reference in the contracts. Forms UIT-194-IC, UIT-194-IC3, UIT-IRA-194-IC, UIT-IRA-194-IC3, UITN-194-IC, and UITN-194-IC3, were approved by your state on 11/22/10, 11/19/10, and 12/01/10, respectively. This endorsement is intended to be issued as a safeguard to correct the Separate Account fee reference in any other endorsements or riders that may be issued with the contract.

## Company and Contact

### Filing Contact Information

Angie Fox, angie.fox@aigretirement.com  
 2919 Allen Parkway, L10-30 713-831-6050 [Phone]  
 Houston, TX 77019 713-831-6932 [FAX]

### Filing Company Information

The Variable Annuity Life Insurance Company	CoCode: 70238	State of Domicile: Texas
2929 Allen Parkway, L10-30	Group Code: 11	Company Type:
Houston, TX 77019	Group Name:	State ID Number:
(713) 831-1305 ext. [Phone]	FEIN Number: 74-1625348	

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## Filing Fees

Fee Required? Yes  
 Fee Amount: \$100.00  
 Retaliatory? Yes  
 Fee Explanation: the fee required to make this filing in our domicile state of Texas is \$100; therefore, \$100 is included with this submission.  
 Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
The Variable Annuity Life Insurance Company	\$100.00	01/27/2011	44151346

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## Correspondence Summary

### Dispositions

<b>Status</b>	<b>Created By</b>	<b>Created On</b>	<b>Date Submitted</b>
Approved-Closed	Linda Bird	02/01/2011	02/01/2011

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## Disposition

Disposition Date: 02/01/2011

Implementation Date:

Status: Approved-Closed

Comment:

Rate data does NOT apply to filing.

Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Flesch Certification		Yes
Supporting Document	Application		No
Supporting Document	Life & Annuity - Acturial Memo		No
Supporting Document	statement of variability		Yes
Form	endorsement		Yes

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## Form Schedule

Lead Form Number: EDSAC-111

Schedule Item Status	Form Number	Form Type	Form Name	Action	Action Specific Data	Readability	Attachment
	EDSAC-111	Certificate endorsement	Amendment, Insert Page, Endorsement or Rider	Initial		50.300	EDSAC-111_filedversion.pdf

**THE VARIABLE ANNUITY LIFE INSURANCE COMPANY**  
**(the "Company")**  
**[2929 Allen Parkway**  
**Houston, Texas 77019]**

**ENDORSEMENT**

This Endorsement is made a part of the Contract or Certificate to which it is attached (the "Contract"). This Endorsement shall supersede any inconsistent provisions of the Contract or any endorsement issued prior to or concurrent with this Endorsement. This Endorsement amends the Contract as follows:

The amount of the Separate Account Charge depends on the Variable Investment Option from which it is deducted, and is imposed at an annual rate of up to [2.10%] of the assets of the Variable Investment Option.

The provisions of this Endorsement shall be effective on the Contract date of issue.

**THE VARIABLE ANNUITY LIFE INSURANCE COMPANY**

[ *Katherine Stoner* ]

SECRETARY

<i>SERFF Tracking Number:</i>	<i>AGNN-126999868</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>The Variable Annuity Life Insurance Company</i>	<i>State Tracking Number:</i>	<i>47822</i>
<i>Company Tracking Number:</i>	<i>EDSAC-111</i>		
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	<i>Variable and Variable</i>		
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## Supporting Document Schedules

	<b>Item Status:</b>	<b>Status</b>
		<b>Date:</b>
<b>Satisfied - Item:</b>	Flesch Certification	
<b>Comments:</b>		
<b>Attachment:</b>		
flesch.pdf		

	<b>Item Status:</b>	<b>Status</b>
		<b>Date:</b>
<b>Satisfied - Item:</b>	statement of variability	
<b>Comments:</b>		
<b>Attachment:</b>		
SOV-EDSAC-111.pdf		

## CERTIFICATION

THE VARIABLE ANNUITY LIFE INSURANCE COMPANY, NAIC #70238, hereby certifies that the following form(s) comply with the Flesch scale of readability requirements of Ark. Stat. Ann. s 23-80-206 and s 23-80-207 as cited in the Life and Disability Insurance Policy Language Simplification Act.

<u>Form Number</u>	<u>Form Description</u>	<u>Flesh Score</u>
EDSAC-111	Endorsement	50.3



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Tracey Harris  
Vice President

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January 25, 2011  
Date

**Statement of Variability for Form(s):**

**EDSAC-111**

**The following items listed below are variable. Any changes will be for new issues only and on a non-discriminatory basis.**

1. The **mailing address** is bracketed for administrative purposes.
2. The **Separate Account Charge** of 2.10% is bracketed and may range between 0.75% to 2.10%.
3. The **Office Signatures** on the cover page of the policy are bracketed for administrative purposes.



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Tracey Harris - Vice President  
The Variable Annuity Life Insurance Company

Date 01.24.2011

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